

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	No. 3: CR-13-271
VS.	:	
	:	
RANDY COLEMAN, JR.	:	
Defendant	:	

MOTION FOR APPOINTMENT OF AN INVESTIGATOR

NOW COMES the defendant, RANDY COLEMAN, JR., by and through his attorney, DAVID CHERUNDOLO, Esquire and files this Motion averring the following in support thereof:

1. Your defendant, RANDY COLEMAN, JR., is charged with Conspiracy to Commit Sex Trafficking and related offenses.

2. The defendant, through counsel, believes and therefore avers that in order to properly prepare a defense in the instant case a Criminal Investigator is needed in order to develop affirmative defenses as well as in assisting with the gathering of evidence.

3. The defendant, through counsel, has spoken to FRANK GRIPPI, of Scranton, Pennsylvania, who has indicated a willingness to assist in the preparation of such a defense.

4. The defendant avers that his is indigent and without funds and has obtained the services of court appointed counsel.

5. The defendant seeks this Honorable Court to enter an Order authorizing Defendant, through counsel, to employ the services of FRANK GRIPPI in the instant case.

WHEREFORE, the Defendant respectfully requests this Honorable Court to enter an Order authorizing employment of FRANK GRIPPI in the above captioned case.

RESPECTFULLY SUBMITTED:

/S/ DAVID CHERUNDOLO, ESQUIRE
DAVID CHERUNDOLO, ESQUIRE

Dated: January 14, 2014